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VIA E-FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, Delaware 19801

**Re: *Crystallex International Corporation v. Bolivarian Republic of Venezuela et al.*,
C.A. No. 17-mc-151-LPS**

Dear Judge Stark:

We write to respectfully inform the Court that ConocoPhillips objects to entry of the proposed order approving the fees of the Special Master and his Advisors for the month of July 2021. D.I. 304; D.I. 306. We note that the Special Master is requesting approval of fees that already exceed the \$2 million cap set by this Court's May 27 order, D.I. 277 ¶ 15, and that it is likely that substantial additional fees have been and will be generated prior to the entry of a Sales Procedures Order.

ConocoPhillips believes that the issues involved in the Special Master's request for permission to exceed the fee cap and the Special Master's Proposed Sales Procedures Order are heavily intertwined – in particular with respect to the advisability of retaining a significant number of professionals generating a substantial level of expense prior to receipt of OFAC authorization for a sale of PDVH shares. For that reason, ConocoPhillips agrees with CITGO and PDVH that it would be more efficient for the parties and the Court if objections to the July fees and the Proposed Sales Procedures Order be due on the same day, August 25, 2021.

We thank the Court for its attention to this matter.

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Respectfully submitted,

/s/ Garrett B. Moritz

Garrett B. Moritz (#5646)

cc: All Counsel of Record
Robert Pincus, Special Master